

**FILED**  
UNITED STATES DISTRICT COURT  
IN THE UNITED STATES DISTRICT COURT ~~OF~~ ALBUQUERQUE, NEW MEXICO  
FOR THE DISTRICT OF NEW MEXICO DEC - 2 2009

SAMANTHA PERINO,  
JEANNIE HETHERINGTON, and  
JILL DUSENBERRY,

MATTHEW J. DYKMAN  
CLERK

Plaintiffs,

vs.

CIV No. 07-144 WDS/DJS

GLENN SLAUGHTER,

Defendant.

**SPECIAL VERDICT FORM**

**I. PLAINTIFFS' ILLEGAL SEARCH CLAIM**

1. Do you find by a preponderance of the evidence that Plaintiff Reeves-Frame was strip searched in the dressing room.

Yes \_\_\_\_\_ No ✓

If your answer if Yes proceed to question number 2. If the answer is No you have returned a verdict for the Defendant as to this Plaintiff's claim and you should proceed to question number 3.

2. Do you find by a preponderance of the evidence that Defendant Slaughter set into motion a series of events that he knew or reasonably should have known would cause others to violate Plaintiff's constitutional rights, or if he personally directed other officers to commit the violation or if he had actual knowledge of the violation and acquiesced in its continuance.

Yes \_\_\_\_\_ No \_\_\_\_\_

If you have answered "Yes" to questions 1 and 2 you have found liability in favor of this Plaintiff. You will ultimately proceed to question number 9 to consider

damages. Proceed to question 3.

3. Do you find by a preponderance of the evidence that Plaintiff Hetherington was strip searched in the dressing room.

Yes \_\_\_\_\_ No ☒

If your answer is Yes proceed to question number 4. If the answer is No you have returned a verdict for the Defendant as to this Plaintiff's claim and you should proceed to question number 5.

4. Do you find by a preponderance of the evidence that Defendant Slaughter set into motion a series of events that he knew or reasonably should have known would cause others to violate Plaintiff's constitutional rights, or if he personally directed other officers to commit the violation or if he had actual knowledge of the violation and acquiesced in its continuance

Yes \_\_\_\_\_ No \_\_\_\_\_

If you have answered "Yes" to questions 3 and 4 you have found liability in favor of this Plaintiff. You will ultimately proceed to question number 9 to consider damages. Proceed to question 5.

5. Do you find by a preponderance of the evidence that Plaintiff Dusenberry was strip searched in the dressing room.

Yes ☒ No \_\_\_\_\_

If your answer is Yes proceed to question number 6. If the answer is No you have returned a verdict for the Defendant as to this Plaintiff's claim and you should proceed to question number 7.

6. Do you find by a preponderance of the evidence that Defendant Slaughter set into motion a series of events that he knew or reasonably should have known would cause others to violate Plaintiff's constitutional rights, or if he personally directed other officers to commit the violation or if he had actual knowledge of the violation and acquiesced in its continuance.

Yes ☒No ☐

If you have answered "Yes" to questions 5 and 6 you have found liability in favor of this Plaintiff. You will ultimately proceed to question number 9 to consider damages. Proceed to question 7.

## II. PLAINTIFFS' STATE LAW CLAIMS

7. Do you find by a preponderance of the evidence that Defendant Slaughter falsely imprisoned the following Plaintiffs?

Samantha Reeves-Frame: Yes ☐No ☒Jeannie Hetherington: Yes ☐No ☒Jill Dusenberry: Yes ☒No ☐

If you have answered "Yes" with respect to any of the above Plaintiff's you have found liability in favor of their claim. You will ultimately proceed to question No. 9 to consider damages. Proceed to question 8.

8. Do you find by a preponderance of the evidence that Defendant Slaughter assaulted the following Plaintiffs?

Samantha Reeves-Frame: Yes ☐No ☒Jeannie Hetherington: Yes ☐No ☒Jill Dusenberry: Yes ☐No ☒

If you have answered "Yes" with respect to any of the above Plaintiff's you have found liability in favor of their claim. You will proceed to question No. 9 to consider damages.

**IV. PLAINTIFFS' CLAIM FOR DAMAGES**

9. In accordance with the damage instructions given by the Court, we award the following compensatory damages:

Samantha Reeves-Frame: \$ 0

Jeannie Hetherington: \$ 0

Jill Dusenberry: \$ 2,000<sup>-</sup>

Please proceed to Question No. 7.

10. In accordance with the damage instructions given by the Court, we award the following punitive damages for the violation of Plaintiffs' Fourth Amendment constitutional rights only:

Samantha Reeves-Frame: \$ 0

Jeannie Hetherington: \$ 0

Jill Dusenberry: \$ 3,000<sup>00</sup>

You have now completed this verdict. Your foreperson must sign this verdict, and you will all return to open court.

DATED December 2, 2009.

\_\_\_\_\_  
FOREPERSON